

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Thomas Dexter Jakes Plaintiff	Civil Action No. 2:24-CV-1608-WSS
~against~ Duane Youngblood, et al. Defendant	Declaration Of Tyrone Blackburn In Support Of Defendant's Special Motion To Dismiss Pursuant To Pennsylvania's Anti- Slapp Statute

I, Tyrone A. Blackburn, Esq., being duly sworn, depose and state under the penalty of perjury as follows:

1. I am the managing attorney at T.A. Blackburn Law, PLLC, with offices at 90 Broad Street, 2nd Floor, New York, NY 10004, and serve as counsel for Defendant Duane Youngblood in the above-captioned matter.
2. In furtherance of Defendant's Special Motion to Dismiss Pursuant to Pennsylvania's Anti-SLAPP Statute, I have attached the following exhibits, which are relevant to the facts and issues raised in this case:

Exhibit A: Sworn Affidavit of Jeffrey S. Gray

Exhibit B: Sworn Affidavit of Richard Edwin Youngblood

Exhibit C: Sworn Affidavit of Daniel B. Spaulding

Exhibit D: Sworn Affidavit of LaShawn Youngblood

Exhibit E: Sworn Affidavit of Joshua Munoz

Exhibit F: Sworn Affidavit of Landon Claybourne

Exhibit G: News Article - *More About TD Jakes' Gay Accusations Plus Paedophilia Activities Lands Online*

Exhibit H: News Article - *T.D. Jakes: 'If Everything Was True, All I Got to Do Is Repent'*

Exhibit I: Screenshot of Jermaine Jakes' Threatening Message to Defendant Duane Youngblood

Exhibit J: Psychological Evaluation by Linda Sturdivant, M.Ed., LPC, detailing Defendant's trauma exacerbated by threats

Exhibit K: News Article - *Bishop T.D. Jakes Denies Sexual Misconduct at Diddy's Parties*

Exhibit L: News Article - *Bishop T.D. Jakes and Long-Time Friend Accused of Sexual Assault*

Exhibit M: News Article - *Kenneth Copeland, T.D. Jakes, & Rick Warren Are Being Accused of Sexual Abuse*

Exhibit N: News Article - *Text Messages of Bishop T.D. Jakes Flirting with a Man Surface*

Exhibit O: News Article - *Victims Come Forward About Bishop T.D. Jakes, Plans to File Sexual Assault Lawsuits*

Exhibit P: Full Text of *New York Times Co. v. Sullivan*, 376 U.S. 254

Exhibit Q: Pennsylvania Anti-SLAPP Statute (*Act of Jul. 17, 2024, P.L. 836, No. 72*)

Exhibit R: Full Text of *Philadelphia Newspapers v. Hepps*, 475 U.S. 767

Exhibit S: Court Order Denying Jakes' Motion for Expedited Discovery

Exhibit T: Police Report Filed by Duane Youngblood Regarding Jermaine Jakes' Threat

3. Each exhibit has been carefully reviewed and deemed critical to supporting Defendant's Special Motion to Dismiss and to substantiating claims that Plaintiff T.D. Jakes and Jermaine Jakes engaged in retaliatory conduct against Defendant.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Respectfully submitted,

Dated: January 23, 2025

/s/Tyrone A. Blackburn, Esq.
Tyrone A. Blackburn, Esq.
T. A. Blackburn Law, PLLC.
90 Broad Street, 2nd Floor
New York, NY 10004